

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Heidi Tolles)	
)	C.A. No. 3:18-3227-TLW-PJG
Plaintiff,)	
)	
v.)	DEFENDANT UNIVERSITY OF SOUTH
)	CAROLINA'S ANSWERS TO LOCAL
Corporate Solutions, LLC, and University of)	RULE 26.01 INTERROGATORIES
South Carolina,)	
)	
Defendants.)	
_____)	

Defendant University of South Carolina answers the Court's interrogatories pursuant to Local Rule 26.01, D.S.C., as follows:

- (A) **State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.**

Answer: None known.

- (B) **As to each claim, state whether it should be tried jury or nonjury and why.**

Answer: If Plaintiff's claims were factually and legally viable, portions of the claims would be triable to a jury as Plaintiff requested.

- (C) **State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.**

Answer: Defendant University of South Carolina is a state university.

- (D) **State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).**

Answer: The matter was removed to the Columbia Division because it was filed in state

court in Richland County, which is embraced by the Columbia Division. 28 U.S.C. § 1441(a).

- (E) Is this action related in whole or in party to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action.**

Answer: Defendant is not aware of any related actions.

- (F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.**

Answer: Defendant University of South Carolina is properly identified.

- (G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.**

Answer: Defendant is aware of no such entity.

December 7, 2018

Columbia, South Carolina

s/ R. Hayne Hodges III
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